

Memorandum

To:	Chelsea Oakes, County of San Diego
From:	Pat Atchison, Markus Spiegelberg, Scott Fleury, ICF
Date:	October 22, 2021
Re:	North County Multiple Species Conservation Plan Covered Species List Review and Recommended Revisions

This memo describes the review process and recommendations for changes to the list of Covered Species for the North County Multiple Species Conservation Plan (North County Plan). The objectives of this memo are to:

- Describe the criteria used for Covered Species selection.
- Explain the process for selecting potential additional Covered Species.
- Make a recommendation and provide a rationale for the changes to the Covered Species list.

A list of Covered Species was developed as part of the preparation of a preliminary public review draft North County Plan (San Diego County 2009) and included 63 species. Subsequent review of the list during the preparation of the Preliminary Draft North County Plan (San Diego County 2017) reduced the number of species down to 29. The Plan Area has been recently reevaluated and has been expanded to include substantially more area to the east and south, bringing in new habitat types and the distributions of additional species warranting this Covered Species list review.

Background

The Endangered Species Act (ESA) and Natural Community Conservation Planning Act (NCCPA) require applicants to list the species for which take authorization is requested through Wildlife Agency permits. This is commonly referred to as the Covered Species list. The ESA and NCCPA require that the North County Plan evaluate the impacts of covered activities (i.e., those activities for which take authorization is requested) on Covered Species and estimate the level of take expected from these covered activities. Because of these regulatory requirements, the North County Plan must focus significant attention and analysis on the Covered Species.

The Covered Species list screening process evaluates species currently on the federal and state endangered and threatened species lists, other special-status species, and fully protected species, as well as birds protected by the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act. The primary focus of the North County Plan is to provide incidental take of federal and state ESA listed species. Therefore, the covered species list is primarily driven by species that are already listed or have a reasonable potential to be listed during the permit term. Rarely, additional special status-species may also be included on a case-by-case basis due to their local conservation importance even if listing is unlikely.

Definition of Special-Status Species

Special-status species are defined as plants and animals that are legally protected under ESA, CESA, or other regulations identified below, and species that are considered sufficiently rare by the scientific community to qualify for such listing.

Special-status plants are species with one or more of the following characteristics:

- Listed or proposed for listing as threatened or endangered under ESA (50 Code of Federal Regulations [CFR] 17.12 [listed plants] and various notices in the *Federal Register* [FR] [proposed species]).
- Candidates for possible future listing as threatened or endangered under the ESA (70 FR 24870–24934, May 11, 2005).
- Listed or candidates for listing by the State of California as threatened or endangered under CESA (14 California Code of Regulations [CCR] 670.5).
- Listed as rare under the California Native Plant Protection Act (California Fish and Game Code Section 1900 et seq.).
- Determined to meet the definitions of rare or endangered under CEQA (State CEQA Guidelines, Section 15380).
- Considered by the California Native Plant Society (CNPS) to be “rare, threatened or endangered in California” (California Rare Plant Ranks 1B and 2B) or vascular plants, bryophytes, and lichens listed as having special status by CDFW (CNDDDB 2021).
- Listed by CNPS as plants about which more information is needed to determine their status and plants of limited distribution (California Rare Plant Ranks 3 and 4) that may be included on the basis of local significance or recent biological information.
- Listed or proposed for listing as threatened or endangered under the ESA (50 CFR 17.11 [listed animals] and various notices in the FR [proposed species]).
- Candidates for possible future listing as threatened or endangered under the ESA (70 FR 24870–24934, May 11, 2005), or as species of concern (National Marine Fisheries Service [NMFS]).
- Determined to meet the definitions of rare or endangered under CEQA (State CEQA Guidelines, Section 15380).
- Listed or candidates for listing by the State of California as threatened or endangered under CESA (14 CCR 670.5).
- Wildlife species of special concern to CDFW (CNDDDB 2021).
- Fully protected species under the California Fish and Game Code Section 3511 (birds), Section 4700 (mammals), Section 5515 (fish), and Section 5050 (reptiles and amphibians).
- Species with no formal special status but thought by experts to be rare or in serious decline and to warrant special status based on recent information.

Covered Species List Criteria

The following criteria are applied to identify which species are appropriate to include on the Covered Species list. These same criteria have been used to develop the Covered Species list for previous iterations of the North County Plan.

Occurrence

This criterion specifies that the species is known to occur or has a strong likelihood to occur in the Plan Area. Occurrence data is based on evidence of verified observations within the Plan Area, or suitable habitat in the Plan Area with evidence of nearby occurrences. The resources used for identifying occurrence data for special-status species include the California Natural Diversity Database (CNDDB), SanBios, the USFWS Carlsbad office species database, the CNPS database, the San Diego Management and Monitoring Program (SDMMP) Master Occurrence Database, and the available habitat suitability models. Potential for occurrence in the Plan Area is indicated as yes or no in the evaluation table.

Status

This criterion is intended to identify any species that are federally or state-listed or have reasonable potential to become listed during the permit term. Potential for listing during the permit term is based on current listing status, consultation with experts and Wildlife Agency staff, consideration of population trends and threats, and best professional judgment of the biologists working on the North County Plan.

For non-listed plant species, the California Rare Plant Rank (CRPR) and threat rank were also used to assist in determining status and potential for being listed. Non-listed plants at CRPR 1B.1 (rare, threatened, or endangered in California and elsewhere, and seriously threatened in California) were considered to have a higher potential for listing, while those at CRPR 1B.2, 1B.3, 2B (rare, threatened, or endangered in California, but more common elsewhere and moderately to not very threatened in California), 3 (more information is needed - a review list), and 4 (limited distribution – a watch list) were generally considered to have a low potential for listing. Non-listed species were indicated as having a high, moderate, or low potential for listing in the evaluation table based on available information and best professional judgment.

The County of San Diego system to rank plant and animal species was also used for this analysis (County of San Diego 2010). Sensitive Plants are listed as A through D. List A (rare, threatened or endangered in California and elsewhere) were considered to have a higher potential for listing, while List B (Plants rare, threatened or endangered in California but more common elsewhere), List C (Plants which may be rare, but need more information to determine their true rarity status) and List D (Plants of limited distribution and are uncommon, but not presently rare or endangered) were generally considered to have a low potential for listing. The County has two groups for ranking animals. Group 1 are mostly listed species or species that may become listed in the future. Group 2 species are mostly vulnerable or rare species, but with a lower likelihood of listing.

Impact

This criterion considers the likelihood that implementation of proposed covered activities will result in take of the species, including take of individuals or modification of habitat. An impact may result from direct removal of habitat associated with a new project or operations and maintenance activity, or from indirect effects from projects and operations and maintenance activities (e.g., diversions of hydrological flow impacting downstream hydrology or groundwater levels that in turn affect species). The potential for each species to be impacted by proposed covered activities was evaluated by reviewing occurrence data and habitat suitability models in the revised Plan Area, relative to the areas where most covered activities are likely to occur outside of the proposed Priority Conservation Area (PCA) boundaries. Potential for impacts from covered activities were indicated as having a high, moderate, or low potential in the evaluation table based on available information and best professional judgment.

Data

Species coverage determination must be based on the best available scientific data, and there must be sufficient data on the species' life history, habitat requirements, and occurrence in the Plan Area to adequately evaluate potential impacts on the species and to develop conservation actions to address these impacts and contribute to species recovery. The amount of relevant scientific data for each species was considered and indicated as high, moderate, or low in the evaluation table based on available information and best professional judgment.

Proposed Changes to the Covered Species List

This reevaluation of the Covered Species list and the Watchlist species from the Preliminary Draft North County Plan (County of San Diego 2017) resulted in the recommended addition of four species shown in Table 1. The four sensitive butterfly species were not included in the recommended list for the North County Plan because they are planned to be covered in a separate Regional Butterfly HCP for San Diego County. Three of these species were proposed as covered under the previous draft Plan, and have been moved to a pending category, as their status is pending the results of the Regional Butterfly HCP. These were the Harbinson's dun skipper (*Euphyes vestris harbisoni*), Hermes copper butterfly (*Lycaena hermes*), and quino checkerspot butterfly (*Euphydryas Editha quino*).

Table 2 includes the results of the application of the criteria described above and a description of the rationale for recommendations to make changes to the Covered Species list. Note that these recommendations do not represent the final Covered Species list for the North County Plan and may change based on new information or input from Wildlife Agencies, County staff, and stakeholders.

Table 1. Recommended North County Plan Covered Species List

Common Name	Scientific Name	Federal Status	State Status	County Rank/CRPR
<i>Additional species proposed to be included highlighted in green</i>				
Invertebrates				
Riverside fairy shrimp	<i>Streptocephalus wootoni</i>	FE	-	1
San Diego fairy shrimp	<i>Branchinecta sandiegonensis</i>	FE	-	1
Amphibians and Reptiles				
Arroyo toad	<i>Anaxyrus californicus</i> (<i>Bufo californicus</i>)	FE	SSC	1
Western spadefoot toad	<i>Spea</i> (<i>Scaphiopus</i>) <i>hammondii</i>	-	SSC	2
Southwestern pond turtle	<i>Clemmys marmorata pallida</i>	-	SSC	1
Coast horned lizard	<i>Phrynosoma blainvillii</i>	-	SSC	2
California red-legged frog	<i>Rana draytonii</i>	FT	SSC	1
Birds				
Coastal cactus wren	<i>Campylorhynchus brunneicapillus sandiegensis</i>	-	SSC	1
Coastal California gnatcatcher	<i>Polioptila californica</i>	FT	SSC	1
Golden eagle	<i>Aquila chrysaetos canadensis</i>	-	SSC/FP	1
Bald Eagle	<i>Haliaeetus leucocephalus</i>	BLM:S; USFWS:S	SE	1
Least Bell's vireo	<i>Vireo bellii pusillus</i>	FE	CE	1
Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	FE	CE	1
Tricolored blackbird	<i>Agelaius tricolor</i>	-	CT	1
Western Burrowing owl	<i>Athene cunicularia hypugaea</i>	-	SSC	1
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FE	CE	n/a
Mammals				
Stephens' kangaroo rat	<i>Dipodomys stephensi</i>	FE	CT	1
Pallid bat	<i>Antrozous pallidus</i>	-	SSC	2
Townsend's big-eared bat	<i>Corynorhinus townsendii pallescens</i>	-	SSC	2
Mountain lion	<i>Puma concolor</i>	-	SP/SPE	2
Plants				
Del Mar manzanita	<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>	FE	-	A/1B
Encinitas baccharis	<i>Baccharis vanessae</i>	FT	CE	A/1B
Engelmann oak	<i>Quercus engelmannii</i>	-	-	D/4
San Diego ambrosia	<i>Ambrosia pumila</i>	FE	-	A/1B
San Diego button-celery	<i>Eryngium aristulatum</i> var. <i>parishii</i>	FE	CE	A/1B
San Diego thornmint	<i>Acanthomintha ilicifolia</i>	FT	CE	A/1B
Spreading navarretia	<i>Navarretia fossalis</i>	FT	-	A/1B

Common Name	Scientific Name	Federal Status	State Status	County Rank/CRPR
Thread-leaved brodiaea	<i>Brodiaea filifolia</i>	FT	CE	A/1B
Mojave tarplant	<i>Deinandra mohavensis</i>	-	CE	A/1B
Species Removed from Previous List				
Orcutt's spineflower	<i>Chorizanthe orcuttiana</i>	FE	CE	A/1B
Species Pending Future Regional Butterfly HCP				
Harbison's dun skipper ¹	<i>Euphyes vestris harbisoni</i>	-	-	NE/1
Hermes copper butterfly ¹	<i>Lycaena hermes</i>	Candidate	-	1
Quino checkerspot butterfly ¹	<i>Euphydryas editha quino</i>	FE	SPE	NE/1
Laguna mountain skipper ²	<i>Pyrgus ruralis lagunae</i>	FE	-	1
Previous Watchlist Species Considered but Not Included³				
Red-diamond rattlesnake	<i>Crotalus ruber</i>	USFS:S	SSC	2
Coast range newt	<i>Taricha torosa</i>	-	SSC	2
Rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	-	WL	1
Grasshopper sparrow	<i>Ammodramus savannarum perpalladus</i>	-	SSC	1
Bell's sparrow	<i>Artemisiospiza belli</i>	USFWS:BCC	WL	1
Northern harrier	<i>Circus (cyaneus) hudsonius</i>	-	SSC	1
San Diego black-tailed jackrabbit	<i>Lepus californicus bennettii</i>	-	SSC	2
American badger	<i>Taxidea taxus</i>	-	SSC	2
California adolphia	<i>Adolphia californica</i>	-	-	B/2B
Rainbow manzanita	<i>Arctostaphylos rainbowensis</i>	BLM:S USFS:S	-	A/1B
Parish's brittlescale	<i>Atriplex parishii</i>	USFS:S	-	A/1B
Wart-stemmed ceanothus	<i>Ceanothus verrucocus</i>	-	-	B/2B
Chaparral beargrass	<i>Nolina cismontana</i>	USFS:S	-	A/1B
Other Species Considered but Not Included				
Arroyo chub	<i>Gila orcuttii</i>	USFS:S	SSC	1
Banana slug	<i>Ariolimax columbianus stramineas</i>	-	-	2
Crotch bumble bee	<i>Bombus crotchii</i>	-	SPE	-
Glossy snake	<i>Arizona elegans occidentalis</i>	-	SSC	-
Southern mountain yellow-legged frog	<i>Rana muscosa</i>	FE; USFS:S	SE	1

Common Name	Scientific Name	Federal Status	State Status	County Rank/CRPR
Two-striped garter snake	<i>Thamnophis hammondi</i>	BLM:S; USFS:S	SSC	1
South coast garter snake	<i>Thamnophis sirtalis</i> ssp.	-	SSC	2
Aguanga/Earthquake Kangaroo Rat	<i>Dipodomys merriami collinus</i>	-	-	-
Southern mule deer	<i>Odocoileus hemionus fuliginatus</i>	-	SSC	2
Nevin's barberry	<i>Berberis nevinii</i>	FE	CE	A/1B
Cuyamaca Lake downingia	<i>Downingia concolor</i> var. <i>brevior</i>	-	CE	A/1B
Cuyamaca larkspur	<i>Delphinium hesperium</i> ssp. <i>cuyamaca</i>	-	SR	A/1B
Parish's meadowform	<i>Limnanthes alba</i> ssp. <i>parishii</i>	-	CE	A/1B
Gander's ragwort	<i>Packera ganderi</i>	-	SR	A/1B
California Orcutt grass	<i>Orcuttia californica</i>	FE	CE	A/1B
San Bernardino blue grass	<i>Poa atropurpurea</i>	FE	-	A/1B
Mission canyon bluecup	<i>Githopsis diffusa</i> ssp. <i>filicaulis</i>	USFS:S	-	-/3

¹Harbinson's dun skipper, Hermes copper butterfly and quino checkerspot butterfly were on the covered species list in the 2017 draft North County Plan and will be included in the current North County Plan should the Regional Butterfly HCP not be completed.

²Laguna Mountain Skipper was not part of the 2017 Draft North County Plan species list but was considered as part of this analysis.

³Watchlist from the 2017 Draft North County Plan

Federal Status	State Status	Other Status
FE = Federally Listed as Endangered	SE = State Listed as Endangered	BLM:S = BLM Sensitive
FT = Federally Listed as Threatened	ST = State Listed as Threatened	SSC = California Species of Special Concern
	SR = State Listed as Rare	USFS:S = US Forest Service Sensitive
	SPE = State Proposed Endangered	FP = Fully Protected
	WL = State Watch List	NE = MSCP Narrow Endemic
		USFWS: BCC = Birds of Conservation Concern

Table 2. Reevaluation Results from Application of Covered Species Selection Criteria and Rationale for Recommendation

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
		Federal	State	Occurrences	Status	Impact	Data		
New Species Recommended for Coverage									
California red-legged frog	<i>Rana draytonii</i>	FT	SSC	Y	Listed	L	L	Include	California red-legged frogs were extirpated from San Diego County, but recently reintroduced on the Wheatley Ranch in Mesa Grande (USGS 2020; Heil 2021). They inhabit ponds, marshes, streams and reservoirs. USFWS recommended this species for coverage as they may be encountered near areas of reintroduction. USFWS has developed a safe harbor agreement (USFWS 2021) that covers the species historic range, including San Diego County.
Bald eagle	<i>Haliaeetus leucocephalus</i>	BLM:S; USFS:S	SE	Y	Protected by BGEPA	L	M	Include	Bald Eagle are an annual winter visitor to Lake Henshaw, Cuyamaca, Corte Madera, and Moreno as well as other water bodies (SDMMP 2017, Unitt 2004). Nesting was recently observed in Ramona, Lake Cuyamaca, Lake Henshaw, Lake Wohlford, El Capitan Reservoir and possibly Lake Sutherland (AECOM 2014; ebird, Unitt pers. comm.). Golden eagle and bald eagle are State Fully Protected species and bald eagle is State Endangered.
Mountain Lion	<i>Felis concolor</i>	-	SPE	Y	H	M	M	Include	Mountain lion range throughout the Plan Area. Mortality is primarily caused by depredation permits and vehicle collisions. Increased development and road construction will put additional pressures on the species. Protection of wildlife movement linkages and corridors will be important to the long-term survival of the species within the Plan Area. CDFW has initiated a status review of the southern and central coastal California evolutionarily significant unit (ESU) of mountain lion (CDFW 2021). The mountain lion is currently listed as a Candidate Species in this ESU and receives the same protection as a listed species.
Mojave tarplant	<i>Deinandra mohavensis</i>	-	SE	Y	Listed	L	M	Include	Mojave tarplant occurs in chaparral and riparian scrub, clay and silty soils, low sand bars in riverbeds, along stream channels, and in ephemeral grassy areas in riparian scrub (Calflora 2021 and Riverside MHSCP 2000). Most occurrences are located in the Palomar Mountain National Forest, Cleveland National Forest, and BLM Beauty Mountain Wilderness Study Area. Most occurrences are protected. There are occurrences in Chihuahua Valley on private land outside the Priority Conservation Area that may be impacted by covered activities.

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
		Federal	State	Occurrences	Status	Impact	Data		
Species Removed from Previous Covered Species List									
Orcutt’s spineflower	<i>Chorizanthe orcuttiana</i>	FE	SE	N	Listed	L	H	Not included	There are no extant occurrences of this species within the Plan Area (USFWS 2014). Five of 14 historical occurrences presumed extant, including Oak Crest Park in Encinitas (EO 10; USFWS 2014). Three of these five occurrences are on federal land. Extant locations also include Point Loma Naval Base, and Torrey Pines Natural Reserve. Historical occurrence in Rancho Santa Fe (EO 6) is thought to be extirpated. This species is endemic to San Diego County and is primarily restricted to weathered sandstone bluffs or loose sandy soils in coastal or southern maritime chaparral (USFWS 2014). This species is unlikely to occur within the Plan Area due to limited suitable habitat and thus is not recommended for coverage.
Previous Watchlist Species Considered but Not Included									
Red-diamond rattlesnake	<i>Crotalus ruber</i>	USFS:S	SSC	Y	L	M	M	Not included	Red-diamond rattlesnake are not recommended for coverage as they are unlikely to be listed and well protected within existing conserved lands. This species occurs throughout the Plan Area in appropriate habitat, but generally in elevations under 5,000 feet (Nafis 2011). They can be found in scrub, chaparral, pine-oak woodlands, grassland, and other vegetation communities. This species is threatened by humans as they are venomous and feared, and thus killed.
Coast range newt	<i>Taricha torosa</i>	-	SSC	Y	L	L	M	Not included	Coast range newts are not recommended for coverage as most occurrences are within protected public lands, thus they are unlikely to be impacted by covered activities and unlikely to be listed. In the foreseeable future. Coast range newts occur within the Plan Area in the upper San Diego River watershed within the Cedar, Sandy, Sheep Camp, Johnson, and Boulder Creeks as well as other localities west of the Cuyamaca mountains (SDMMP; SanBios, CNDDB). Most of these occurrences are within the Cleveland National Forest, Rancho Cuyamaca State Park and Tribal lands. This species also occurs in the northwestern portions of the Plan Area within San Mateo Creek/Santa Ana Mountains and possibly upper De Luz Creek area (CNDDB). They inhabit aquatic habitat such as pools, ponds and quiet streams and summer in upland habitat.

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
		Federal	State	Occurrences	Status	Impact	Data		
Rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	-	WL	Y	L	M	M	Not included	Rufous-crowned sparrow is not recommended for coverage as it is a relatively common species that is unlikely to become listed. This species is anticipated to be well protected by currently conserved areas, the North County Plan’s proposed conservation areas, and other HCPs in the region. Rufous-crowned sparrow are known to occur in the coastal lowland and foothills across San Diego County and within the Plan Area (Unitt 2004). This ground-nesting species mostly occurs in sage scrub and chaparral, but also grasslands with scattered shrubs.
Grasshopper sparrow	<i>Ammodramus savannarum perpalladus</i>	-	SSC	Y	L	M	M	Not included	Grasshopper sparrow is not recommended for coverage as it still occurs regularly throughout its historical range and is unlikely to become listed. This species is known to range from Harmony Grove, Santa Ana Mountains, Ramona, Valley Center, Palomar Mountain, and Lake Cuyamaca, and in other areas within San Diego County outside the Plan Area (Unitt 2004). This ground nesting species occurs in native and nonnative grasslands and occasionally sparse coastal sage scrub.
Bell’s (sage) sparrow	<i>Artemisiospiza belli</i>	USFWS:BCC	WL	Y	L	M	M	Not included	Bell’s sage sparrow is not recommended for coverage as it is a relatively common species that is unlikely to become listed. This species is anticipated to be well protected by currently conserved areas, the North County Plan’s proposed conservation areas, and other HCPs in the region. Bell’s sage sparrow is known to occur throughout most of the Plan Area in sage scrub and chaparral (Unitt 2004). Studies have shown this species to be sensitive to habitat fragmentation (Lovio 1996; Bolger et al. 1997).
Northern harrier	<i>Circus (cyaneus) hudsonius</i>	-	SSC	Y	L	M	L	Not included	Northern harriers are not recommended for coverage as they are not likely to be listed in the foreseeable future. Although northern harriers can be observed foraging across most of the Plan Area, they are more commonly observed in the coastal areas outside the Plan Area, especially during the breeding season (Unitt 2004). Much of the harrier nesting habitat has been lost and abundance is far below historical observations (Unitt 2004). This species nests on the ground typically in marsh and grassland habitats and forages across these habitats, chaparral, and coastal sage scrub.
San Diego black-tailed jackrabbit	<i>Lepus californicus bennettii</i>	-	SSC	Y	L	H	L	Not included	San Diego black-tailed jackrabbit is not recommended for coverage as it is unlikely to become listed in the foreseeable future. While they are generally known to occur in larger habitat patches in the Plan Area, their occurrences have not regularly been documented in occurrence databases. No occurrences were identified in the database review, but one was observed in one of CNLM’s cameras at Rancho La Costa Denk Mountain a few years ago (Harmony Grove Planning Unit; Spiegelberg, pers. comm.).

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American badger	<i>Taxidea taxus</i>	-	SSC	Y	L	L	L	Not included	American badger are occasionally detected in parts of the County, and still occupy much of their historic range. Therefore, it is not likely to be listed in the foreseeable future and not recommended for coverage. American badgers have been detected in the Plan Area since 2009, including Ramona Grasslands (SDMMP 2017). They occur in grassland and shrublands with sand loamy soils (SDMMP 2017). Badgers are at high risk of loss from Conserved Lands in San Diego (SDMMP 2017).
California adolphia	<i>Adolphia californica</i>	-	-	Y	L	L	H	Not included	California adolphia is not recommended for coverage as it unlikely to become listed. This species is anticipated to be well protected by currently conserved areas, the North County Plan’s proposed conservation areas, and other HCPs in the region. California adolphia is found only in San Diego County and northern portion of Baja California. Its distribution is discontinuous, often locally abundant, but with large separation among populations. It is commonly found in portions of San Marcos and Carlsbad, and south through Rancho Santa Fe, the San Dieguito River and portions of Otay (outside the Plan Area). It is only found within the Harmony Grove Planning Unit of the Plan Area.
Rainbow manzanita	<i>Arctostaphylos rainbowensis</i>	BLM:S USFS:S	-	Y	L	M	H	Not included	Rainbow manzanita is not recommended for coverage as the species is well protected on public land and unlikely to become listed. Although known only from a highly restricted range, there are many known occurrences of Rainbow manzanita in the northern portions of the Plan Area from the Santa Ana Mountains east to Agua Tibia Mountain, both on private and public land, and outside the Plan Area near Temecula (CNDDDB). One occurrence is west of the I-15 in Escondido and one is in Valley Center (CNDDDB). This species is primarily found tin southern mixed chaparral, principally on gabbro soils or related soils rich in ferromagnesian minerals (Boyd and Banks 1995).
Parish’s brittlescale	<i>Atriplex parishii</i>	USFS:S	-	Y	L	L	H	Not included	Parish’s brittlescale is not recommended for coverage as most occurrences are already protected, it is unlikely to be impacted by covered activities, and has a low likelihood of becoming listed. Within the Plan Area, Parish’s brittlescale is found within the Ramona Grassland Preserve (CNDDDB, SDMMP), near Warner Springs Ranch on private land (CNDDDB), and near the terminus of Paint Mountain Road on the Bridges Preserve owned by the Endangered Habitat Conservancy (Calflora.org). It is also known from outside the Plan Area in southern California. This species is known from alkalai playas and vernal pool habitats.

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Wart-stemmed ceanothus	<i>Ceanothus verrucocus</i>	-	-	Y	L	M	M	Not included	Wart-stemmed ceanothus is not recommended for coverage as it is already well protected and unlikely to become listed in the future. Within the Plan Area, wart-stemmed ceanothus is primarily found west of Interstate-15 within the Harmony Grove Planning Unit (Calflora.org). There is one locality east of Ramona and one locality near Barona (Calflora.org). Outside the Plan Area it can be found within the coastal zone from the border with Mexico to Camp Pendleton (Calflora.org). This species occurs in chaparral and maritime chaparral habitats. Wart-stemmed ceanothus is well protected within existing preserves within San Diego County, mostly as part of the MHCP.
Chaparral beargrass	<i>Nolina cismontane</i>	USFS:S	-	Y	L	L	M	Not included	Chaparral beargrass is not recommended for coverage as the species is unlikely to become listed. Chaparral beargrass is found from Ventura County to northern San Diego County (Hess and Dice 1995).It occurs within the Plan Area east of Hellohole Canyon on BLM property and on private and tribal land near Pala (CNDDDB; SDMMP), near Monserate Mountain and east of Mount Olympus (CNDDDB). It also occurs in the Alpine area and Camp Pendleton in San Diego County. This species prefers chaparral of coastal mountains and ranges in elevation from 200 to 1300 meters. It typically occurs on sandstone and gabbro-derived substrates of chaparral vegetation (Reiser 1994).
Other Species Considered but Not Included									
Arroyo chub	<i>Gila orcuttii</i>	USFS:S	SSC	Y	L	L	L	Not Included	Arroyo chub is not recommended for coverage due to its restricted range and the low likelihood of the species being impacted by covered activities. Known from the Santa Margarita River (and De Luz Creek (tributary to the Santa Margarita River)). Found in the Santa Margarita River Park, Sycuan Peak Ecological Reserve, and Vista Irrigation District properties (SDMMP 2021). Other occurrences mapped in Guejito Creek (CNDDDB). Found in slow-moving or backwater sections of warm streams with mud or sand substrates (SDMMP 2021).
Banana slug	<i>Ariolimax columbrianus stramineas</i>	-	-	Y	L	L	L	Not included	There is insufficient occurrence data to support coverage of banana slug and a low likelihood for the known population on Palomar Mountain to be impacted by covered activities.
Crotch bumble bee	<i>Bombus crotchii</i>	-	SPE	Y	Candidate	H	L	Not included	There is insufficient occurrence data to support coverage of Crotch bumble bee. Potential to occur throughout Plan Area in open grassland and scrub habitats (Hatfield et al. 2018).

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
		Federal	State	Occurrences	Status	Impact	Data		
Laguna Mountain skipper	<i>Pyrgus ruralis lagunae</i>	FE	-	Y	Listed	M	M	Butterfly HCP	Laguna Mountain skipper is proposed for coverage under the County's Regional Butterfly HCP. Occurrences restricted to Palomar Mountain in San Diego County on private, State Park and USFS properties (USFWS 2019). Historically occurred in the Laguna Mountains and likely Cuyamaca Mountains (USFWS 2019). Occurs in montane meadows that support its host plant Cleveland's horkelia (<i>Horkelia clevelandii</i>) (USFWS 2019).
Glossy snake	<i>Arizona elegans occidentalis</i>	-	SSC	Y	L	L	L	Not included	There is insufficient data to support coverage of glossy snake and a low likelihood for the species to be listed in the foreseeable future. Historical occurrences in Bonsall, Julian, Ramona, near Mesa Grande Reservation and Pauma (CNDDDB). More recent observations in the Warner Springs and near the Beauty Mountain Wilderness Area. Other recent observations outside the Plan Area in the San Felipe Hills and Wash areas (CNDDDB). Glossy snake prefer open sandy areas with scattered brush, but also found in rocky areas (CDFW). Although most common in desert habitat, they also occur in chaparral, sagebrush, valley-foothill hardwood, pine-juniper and annual grass up to 6,000 feet (CDFW).
Southern mountain yellow-legged frog	<i>Rana muscosa</i>	FE; USFS:S	SE	N	Listed	L	H	Not Included	Southern mountain yellow-legged frogs are extirpated from San Diego County and therefore not proposed for coverage. Historically they occurred in streams, creeks and ponds in the Palomar Mountain area.
Two-striped garter snake	<i>Thamnophis hammondi</i>	BLM:S; USFS:S	SSC	Y	L	L	L	Not included	There is insufficient data to support coverage of two-striped garter snake and a low likelihood for the species to be listed in the foreseeable future. The species is likely to occur in most of the Plan Area, in areas with perennial and intermittent bodies of water. Known from Santa Ysabel Creek, Ramona Grasslands, Cuyamaca Rancho State Park and other locations (CNDDDB, SDMMP, 2017). Primary threats are habitat loss, nonnative predators and habitat modification.
South coast garter snake	<i>Thamnophis sirtalis</i> ssp.	-	SSC	Y	L	L	L	Not included	There is insufficient data to support coverage of south coast garter snake and a low likelihood for the species to be listed in the foreseeable future.
Aguanga/Earthquake Kangaroo Rat	<i>Dipodomys merriami collinus</i>	-	-	Y	L	L	L	Not included	There is insufficient data to support coverage of Aguanga/Earthquake Kangaroo Rat and a low likelihood for the species to be impacted by covered activities. Only one occurrence has been mapped in the Plan Area (SANBIOS), northeast of the confluence of Temecula Creek and Chihuahu Creek on private land. All other occurrences are east and north of the Plan Area. The species is typically found in sandy loam soils within alluvial fan scrub associated with flood plains, such as Temecula Creek, but may also be found in Riversidian sage scrub, chaparral, and grasslands.

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
		Federal	State	Occurrences	Status	Impact	Data		
Southern mule deer	<i>Odocoileus hemionus fuliginatus</i>	-	-	Y	L	L	M	Not included	Southern mule deer is not recommended for coverage because it is unlikely to be listed in the foreseeable future. Hunting of the species is permitted in the Plan Area with the applicable State-issued deer tag. Like other large species, mule deer occurrence data is typically used for linkage and corridor analysis. Recent genetic studies reveal two regional genetic clusters and the movement is limited between the clusters (Mitelberg et al. 2019). Although movement has been observed from the Harmony Grove to the Valley Center Planning Units (Mitelberg et al. 2019), presumably via the Lake Hodges undercrossing at I-15, this undercrossing can be compromised when the lake is full and water blocks the undercrossing.
Orcutt’s spineflower	<i>Chorizanthe orcuttiana</i>	FE	SE	N	Listed	L	H	Not included	Orcutt’s spineflower is not recommended for coverage as the species is unlikely to occur in the Plan Area. This species is endemic to San Diego County and is primarily restricted to weathered sandstone bluffs or loose sandy soils in coastal or southern maritime chaparral (USFWS 2014). A historical occurrence in Rancho Santa Fe (EO 6) is thought to be extirpated. There are no extant occurrences of this species within the Plan Area (USFWS 2014).
Nevin’s barberry	<i>Berberis nevinii</i>	FE	SE	Y	Listed	L	M	Not Included	There is insufficient data to support coverage of Nevin’s barberry and a low likelihood for the known populations of the species to be impacted by covered activities. Nevin’s barberry is found in various vegetation communities above 1,400 feet in elevation and in alluvial and granite sandstone soils (USFWS 2009). Two occurrences have been identified within the Plan Area: one on the La Jolla Indian Reservation (EO17) and one near Ranchita (EO45)(USFWS 2009). Other occurrences have been identified adjacent to the Plan Area in southern Riverside (USFWS 2009).
Cuyamaca larkspur	<i>Delphinium hesperium</i> ssp. <i>Cuyamacae</i>	-	SR	Y	L	L	M	Not Included	Cuyamaca larkspur is not recommended for coverage as the species is well protected on public and quasi-public land and unlikely to become listed in the foreseeable future. Most known occurrences within the Plan Area are within Cuyamaca Rancho State Park and Palomar Mountain, and a few occurrences on private land (CNDDDB; SDMMP). There are other occurrences to the south of Cuyamaca but outside the Plan Area.
Cuyamaca Lake downingia	<i>Downingia concolor</i> var. <i>brevior</i>	-	SE		Listed	L	S	Not included	Cuyamaca Lake downingia is not recommended for coverage as the species is well protected on public and quasi-public land and is unlikely to be impacted by covered activities. The species inhabits ephemerally inundated montane meadows (Bauder 1994), with most occurrences located in and around Lake Cuyamaca on State Park land and on Helix Water District property (Bauder 1994). One occurrence is located near the intersection of SR-76 and SR-79 on private land.

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
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Gander’s ragwort	<i>Packera ganderi</i>	BLM: S; USFS:S	SR	Y	L	L	M	Not included	Gander’s ragwort is not recommended for coverage as the species most occurrences are on public land and it is unlikely to become listed. Gander’s ragwort is endemic to San Diego and Riverside found in chaparral usually with gabbroic soils (SDMMP 2017). It occurs within the Plan Area in the Cleveland National Forest southwest of Santa Ysabel Reservation and a few locations on private land north of the Pala Reservation (CNDDDB and SanBios). There are also occurrences outside the Plan Area south of Ramona. SDMMP ranks this species as SO due to a moderate risk of loss. It was last monitored by SDMMP in 2016.
Parish’s meadowform	<i>Limnanthes alba</i> spp. parishii	-	SE	Y	Listed	L	S	Not included	Parish’s meadowform is not recommended for coverage as the species is unlikely to be impacted by covered activities. This species occurs in meadows and vernal pools within freshwater wetlands, yellow pine forests, and wetland-riparian vegetation communities (Calflora 2021). Most occurrences in the Plan Area are located around Lake Cuyamaca on State Park properties and USFS properties and are well protected. There are also several occurrences south of Julian (BLM property and private property) and one occurrence near Palomar Mountain (USFS property).
California Orcutt grass	<i>Orcuttii californica</i>	FE	SE	Y	Listed	L	L	Not included	California Orcutt grass is not recommended for coverage as the species is unlikely to be impacted by covered activities. Thirteen occurrences of this vernal pool species have been recorded in all of San Diego (USFWS 2011). Of these, one is within the Plan Area in Warner Valley (EO41).
San Bernardino blue grass	<i>Poa atropurpurea</i>	FE	-	Y	Listed	L	M	Not included	San Bernardino blue grass is not recommended for coverage as the species is well protected on public lands and unlikely to be impacted by covered activities. Species occurs in Laguna (outside Plan Area), Cuyamaca and Palomar Mountains on State Park and USFS property within the Plan Area (USFWS 2008 and USFWS 2020). Known occurrences are on water district and State Park property around Cuyamaca Lake; one on USFS property near Palomar Mountain. This species is restricted to montane meadows.

Common Name	Scientific Name	Status		Criteria for Covered Species				Recommendation for Inclusion on Covered Species List	Notes/Rationale
		Federal	State	Occurrences	Status	Impact	Data		
Mission canyon bluecup	<i>Githopsis diffusa</i> ssp. <i>filicaulis</i>	USFS:S	-	Y	L	L	L	Not included	Mission Canyon bluecup is not recommended for coverage as the species is unlikely to become listed. This species generally occurs in disturbed wetland habitat within chaparral communities, but occasionally in non-wetland habitat (calflora.org). Within the Plan Area, Mission canyon blue cup has recently observed occurrences near Pala and Moosa Canyon, and historic occurrences near Wright Canyon, Barona, Eagle Peak and Japacha Creek (Cuyamaca Mountains), both on private and public land (calflora.org; CNDDDB). Recently observed occurrences are also known from outside the Plan Area at Crestridge Ecological Reserve, Viejas Mountain, Rancho Jamul Ecological Reserve, Otay Mountain Wilderness Area (calflora.org) and near the northeastern boundary of Camp Pendleton (Preston pers. comm.). Mission canyon bluecups was recently added to the SDMMP species as a SL species (risk of loss entirely on Conserved Lands). SDMMP will be conducted focused surveys for this species in 2025 (Preston pers. comm.).

Federal Status
FE = Federally Listed as Endangered
FT = Federally Listed as Threatened
State Status
SE = State Listed as Endangered
ST = State Listed as Threatened
SR = State Listed as Rare
SPE = State Proposed Endangered
WL = State Watch List

Other Status
BLM:S = BLM Sensitive
SSC = California Species of Special Concern
USFS:S = US Forest Service Sensitive
FP = Fully Protected
NE = MSCP Narrow Endemic
USFWS:BCC = Birds of Conservation Concern

Criteria
Y = Yes, known from Plan Area, or strong likelihood to occur due to presence of suitable habitat and known occurrences nearby
N = Not documented in Plan Area and not likely to occur in the Plan Area
H = High likelihood of impact or High level of available data or High likelihood of becoming listed
M = Moderate likelihood of impact or Moderate level of available data or Moderate likelihood of becoming listed
L = Low likelihood of impact or Low level of available data or Low likelihood of becoming listed

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